

ATTACHMENT A-STATEMENT OF FACTS

The undersigned parties hereby stipulate and agree that if this case had proceeded to trial, government would have proven the following facts beyond a reasonable doubt. The undersigned parties also stipulate and agree that the following facts do not encompass all of the evidence that would have been presented had this matter proceeded to trial.

At all times relevant to this case, defendant RAYMOND TALLEY III (TALLEY) resided in Oxon Hill, Maryland.

On August 31, 2011, TALLEY had available files for sharing through a peer to peer network file share program. The following files were downloaded by the undercover agent:

* “!!!NEW!!!Brother Creams Baby Sister (PTHC).mpg,” which depicts an adult male masturbating with a toddler female in his lap. The male turns the child around in his lap and places the child’s hand on his penis while continuing to masturbate. The male also touches the child’s genitalia and appears to have minimal vaginal penetration. The male ejaculates on the child’s genitalia and rubs the ejaculate on/in the genitalia.

* “PTHC Pedo NEW Childporn Private Daughter Torpedo Ranchi Lolita-Veronica 1188495570955.jpg,” which depicts a prepubescent female child laying naked on her back with her arms and legs spread apart. An adult male is kneeling between the child’s legs and has his penis pushed against the child’s genitalia simulating genital penetration.

On September 11, 2011, TALLEY had available files for sharing through a peer to peer network file share program. The following files were downloaded by the undercover agent:

* “P101-WEBCAM-12YO BOY GET SUCKED-BIBCAM-WEBCAMBOY-FXG OLDER BROTHER SUCKS OFF HIS PRETEEN BRO TILL HE ORGASUMS AND HIS WHOLE BODY JERKS-GAY PEDO PTHC.AVI,” which depicts a nude prepubescent boy lying on his back while a male is performing oral sex on him.

* “PTHC JrH555(cum inside pedo pussy!!!)_juicy preteen fuck_dont miss!!!.mpg,” which depicts a prepubescent girl with an adult male who inserts his penis into the child’s vagina and has sex with the child until he ejaculates.

On September 12, 2011, TALLEY had available files for sharing through a peer to peer network file share program. The following file was downloaded by the undercover agent:

* “(Pthc gay) Boy 9y & Man 3-Cum in Mouth.avi,” which depicts a naked prepubescent boy lying on his back on a bed masturbating. A male in a white sweatshirt is then seen masturbating and then the child performs oral sex on the male. The male masturbates and has the child perform oral sex on him. The male then rubs

the ejaculate on the child's mouth.

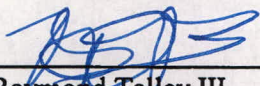
On October 7, 2011, a federal search warrant was executed at TALLEY's residence. Two laptops were seized belonging to TALLEY. Both laptops had file share programs installed. TALLEY had approximately 1,700 videos of child pornography downloaded and saved on his computers.

The videos depict real children engaged in sexually explicit conduct. The images downloaded onto the defendant's computer were transported through the Internet and therefore traveled in interstate commerce.

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I have read this statement of facts, and carefully reviewed it with my attorney. I acknowledge that it is true and correct.

12062012
Date



Raymond Talley III